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October 25, 2000

Linda S. Kahl, Ph.D.
Office of Special Nutritionals (HFS-450)
Center of Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" St. S.W.
Washington, D.C. 20204

Dear Dr. Kahl:

Fitness Labs Nutrition Corporation wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a dietary supplement which bears a statement under Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act.

The dietary supplement for which the statement is made is MSM. The dietary ingredient that is the subject of the statement is Methylsulfonylmethane. The statement reads as follows.

"Maximize Joint and Muscle Health for Enhanced Physical Performance." "MSM (Methyl-Sulfonyl-Methane) is a naturally occurring sulfur compound found in our bodies as well as common beverages and foods such as milk, tea and green vegetables. It is one of the least toxic substances in biology, similar in toxicity to water. Sulfur's essential functions include maintaining the structure of proteins, collagen and keratin in the body – the building block of nails, skin, hair, joints and other connective tissues." "For Healthy Skin, Hair and Nails." "Maximize Joint Health for Enhanced Physical Performance."

These statements are accompanied by the required disclaimer which is prominently displayed in bold-faced type.

This information contained in this notice is complete and accurate and the above statement is based on data which renders these statements substantiated, truthful and non-misleading.

Sincerely,

Fitness Labs Nutrition Corporation

Daniel R. McFarland

President

975-0162

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